

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL CACOPERDO,

Plaintiff,

- vs. -

HARTFORD LIFE INS. CO., MLS NATIONAL
MEDICAL EVALUATIONS, INC. and
MEDICAL EVALUATION SPECIALISTS, INC.
d/b/a/ MES SOLUTIONS.

Defendants.
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10 CV 7847 (RPP)

**DECLARATION OF
JASON NEWFIELD**


Pursuant to 28 U.S.C. § 1746, Jason Newfield states as follows:

1. I am a Partner with Frankel & Newfield, P.C. and I am counsel of record for the Plaintiff, Michael Cacoperdo, in this matter.
2. Annexed hereto as Exhibit "A" is a true and correct copy of a medical report authored by Philip Marion, M.D. regarding Plaintiff Michael Cacoperdo.
3. Annexed hereto as Exhibit "B" is a true and accurate copy of a Declaration of Robert Rosati, Esq., from the action *Terry Hall against MLS National Medical Evaluations, Inc.*, that was commenced in the District Court for the Eastern District of Kentucky, under Index number 05-CV-185.
4. Annexed hereto as Exhibit "C" are true and correct copies of reports produced in the *Testa v. Hartford Life* matter, consisting of an unaltered original report from Dr. Michael Farber, that was produced in response a subpoena upon RRS, and a report that RRS produced to Hartford, which was produced as part of Hartford's administrative record.
5. Annexed hereto as Exhibit "D" is a true and correct copy of an email that was from an employee at MLS National Medical Evaluations, Inc., and an employee at Hartford Life involved with Plaintiff's claim, advising that the report would proceed to the "Quality Assurance" stage.

6. Annexed hereto as Exhibit "E" is a true and correct copy of a Declaration filed by Lawrence Padway, Esq., from a matter entitled Patricia White v. Prudential Ins. Co. of Amer., 10-CV-1855, pending in the District Court, for the Northern District of California, indicating the amounts of payments by Prudential to MLS for various years.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 27, 2011



Jason Newfield